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10 *Attorneys for Defendant Talkiatry  
11 Management Services, LLC*

12 **UNITED STATES DISTRICT COURT**  
13 **CENTRAL DISTRICT OF CALIFORNIA**

14 JANE DOE, individually and on behalf  
15 of others similarly situated,

16 Plaintiff,

17 v.

18 TALKIATRY MANAGEMENT  
19 SERVICES, LLC

20 Defendant.

21 CASE NO. 5:25-cv-00781

22 **JOINT STIPULATION TO MODIFY  
23 BRIEFING SCHEDULE FOR  
24 DEFENDANT'S MOTION TO  
25 DISMISS PLAINTIFF'S PUTATIVE  
26 CLASS ACTION COMPLAINT (Dkt.  
27 11)**

28 *[Proposed] Order Filed Concurrently  
Herewith]*

29 Complaint Served: April 7, 2025  
30 Motion to Dismiss Filed: May 28, 2025  
31 Hearing: September 12, 2025

32 Ballard Spahr LLP  
33 2029 Century Park East, Suite 1400  
34 Los Angeles, California 90067-2915

## **JOINT STIPULATION**

Defendant Talkiatry Management Services, LLC (“Talkiatry”) and Plaintiff Jane Doe (“Plaintiff”), by and through their attorneys, hereby stipulate to modify the briefing schedule for Talkiatry’s anticipated motion to dismiss Plaintiff’s putative class action complaint (the “Complaint”). In support of this Stipulation, the Parties state as follows:

WHEREAS, on March 27, 2025, Plaintiff initiated this putative class action (Dkt. 1);

WHEREAS, Defendant's current deadline to respond to Plaintiff's Class Action Complaint ("Complaint") is currently May 28, 2025;

WHEREAS, Defendant has filed a motion to dismiss Plaintiff's Complaint (Dkt. 11) (the "Motion");

WHEREAS, the Parties have agreed to extend the deadlines to file their opposition to and reply in support of the Motion; and

WHEREAS, the Parties agree that the requested briefing schedule will not prejudice either party or result in undue delay, and it will be in the interests of judicial economy. Thus, the Parties respectfully submit that good cause supports these extensions due to the number of issues to be addressed in the Motion.

NOW THEREFORE, the Parties agree, subject to the Court's approval, to the following briefing schedule for the Motion:

**Opposition:** **July 25, 2025**

**Reply:** August 25, 2025

**Hearing:** **September 12, 2025,**  
**or as soon thereafter as convenient for the Court.**

## IT IS SO STIPULATED.

1 DATED: June 2, 2025

2 Respectfully submitted,

3 **SWIGART LAW GROUP, APC**  
4 **BEN TRAVIS LAW, APC**

**BALLARD SPAHR LLP**

5 BY: /s/ Joshua B. Swigart  
6 Joshua B. Swigart  
Ben Travis

BY: /s/ Brianna R. Howard  
7 Scott S. Humphreys  
Brianna R. Howard

Attorneys for Plaintiff Jane Doe

Attorneys for Defendant Talkiatry  
8 Management Services, LLC

1 I, Brianna R. Howard, attest pursuant to L.R. 5-4.3.4(a)(2)(i) that Talkiatry  
2 Management Services LLC, on whose behalf the filing is submitted, concurs in the  
3 filing's content and has authorized the filing.

4  
5 DATED: June 2, 2025

Respectfully submitted,

6 **BALLARD SPAHR LLP**

7 BY: /s/ Brianna R. Howard

8 Scott S. Humphreys  
Brianna R. Howard

9 *Attorneys for Defendant Talkiatry*  
10 *Management Services, LLC*

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**CERTIFICATE OF SERVICE**

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I hereby certify that on this 2nd day of June, 2025, I electronically filed a true  
3 and correct copy of the foregoing **JOINT STIPULATION TO MODIFY**  
4 **BRIEFING SCHEDULE FOR DEFENDANT'S MOTION TO DISMISS**  
5 (**Dkt. 11**) through the Court's CM/ECF system, which will send a notice of  
electronic filing to the following:

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BY: /s/ Brianna R. Howard  
15 Scott S. Humphreys  
16 Brianna R. Howard

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*18 Attorneys for Defendant Talkiatry  
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